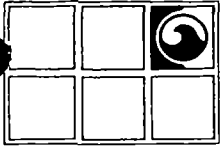




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U.E.P.A.
S.E.D.O.

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**GROUNDWATER
TECHNOLOGY®**

Groundwater Technology, Inc.

600 Clubhouse Drive, Suite 200, Moon Township, PA 15108 USA
Tel: (412) 299-0278 Fax: (412) 299-0461


**DRUM STORAGE AREA
GENERATOR CLOSURE PLAN
WHEELING-PITTSBURGH STEEL CORPORATION
MARTINS FERRY PLANT
MARTINS FERRY, OHIO**

GTI Project 040030374

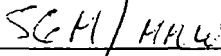
July 24, 1995

Prepared for:
Wheeling-Pittsburgh Steel Corporation
Martins Ferry Plant
Martins Ferry, OH 43935

Groundwater Technology, Inc.
Submitted by:


Mary M. Washko
Lead Geologist

Groundwater Technology, Inc.
Approved by:


Steve McGuire
Sr. Project Manager

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1.0 INTRODUCTION

Wheeling-Pittsburgh Steel Corporation's Martins Ferry Plant, located in Martins Ferry, Ohio, maintained a drum storage area on a paved pad located immediately north of Building #100. The Ohio EPA is requiring that WPSC conduct a generator closure of the drum storage area to meet the closure requirements contained in OAC 3745-66-11 and OAC 3745-66-14.

1.1 Facility Description

The former drum storage area is located on a paved area north of Building No. 100 (Figure 1). The area where the drums were stored is asphalt-paved. The pavement extends several hundred feet to the north and is bordered on the east and west by grassy, vegetated areas. According to WPSC, approximately 50 to 60 drums were stored on a section of the paved area measuring approximately 100-feet long by 70-feet wide.

A preliminary site visit was conducted by Groundwater Technology Inc. (GTI) prior to development of the closure plan to inspect the pad and collect samples of the loose soil and sediment on the pad for preliminary screening and evaluation of contaminants of concern. During the inspection, it was observed that, of the original inventory of drums, only four drums remained in the storage area for disposal. The pavement appeared to be in good condition with some minor cracking evident. Sections of the pad were stained with oil and paint "rings". A vegetated dirt pile with small saplings was observed at the southern end of the pad adjacent to the warehouse. Two storm water catch basins are located in the vicinity of the drum storage area as indicated in Figure 1. There were no drums and no visible evidence of soil staining in the grassy areas to the east and west of the pad.

1.2 Waste Description

The drums stored alkali sludge, waste grease, waste acid and paint waste. Safety Clean sampled the drum contents for characterization prior to disposal. Results of the analyses were compared to the Appendix VIII list of parameters, as referenced in OAC 3745-51-11, to identify contaminants of concern for closure. The following results were obtained:

- The alkali sludge wastes and waste acids are hazardous by characteristic for corrosivity (D002). The pH of the alkali sludge was measured at 12.5; the pH of the waste acid was reported as <1.00. In addition, the TCLP leaching procedure resulted in a chromium concentration of 3.7 mg/l in the waste acid sample, below the TCLP limit of 5 mg/l. There were no other Appendix VIII parameters in the alkali sludge and waste acid samples; however, phosphorous was measured in

concentrations of 382 mg/kg in the alkali sludge sample and 380,000 mg/kg in the waste acid sample. Phosphorous is not an Appendix VIII parameter.

- The paint waste was hazardous by characteristic for ignitability (D001) and spent non-halogenated solvents (F003). The flashpoint for the paint waste sample was reported as 140°F. Solvents detected in the sample were xylene and ethylbenzene.
- There were no Appendix VIII parameters reported in the waste grease. The waste grease was not shipped off-site as a hazardous waste.

In addition to testing drum contents, GTI collected soil samples from the loose soil and sediment on the storage pad during the preliminary site visit. Two composite samples were collected for analysis: one from the eastern edge of the pad and one in the vicinity of the remaining drums and dirt pile. The samples were analyzed for pH, chloride, sulfate, phosphorous and TCLP metals and volatiles. The analyses were compared to the Appendix VIII list of parameters with the following results:

- Sample S1 was collected along the eastern end of the storage pad. The pH of the sample was 7.07; the phosphorous concentration was reported as 270 mg/kg. TCLP metals identified in the sample in excess of detection limits were barium at 0.94 mg/l and lead at 0.21 mg/l. The TCLP limit for these parameters is 100 mg/l and 5 mg/l, respectively. There were no TCLP volatile organics reported in excess of respective detection limits.
- Sample S2 was collected in the vicinity of the dirt pile and the remaining drums. The drums were labeled as spent phosphoric acid. The pH of the sample was reported a 7.27; phosphorous was reported as 2,800 mg/l. TCLP parameters detected in excess of detection limits were barium (0.58 mg/l), cadmium (0.036 mg/l); and lead (0.051 mg/l). The TCLP limits for these parameters are 100 mg/l, 1 mg/l and 5 mg/l, respectively. There were no volatile organics detected in excess of respective detection limits.

Neither of these samples are considered hazardous. Copies of chemical analyses for the drum contents and preliminary soil sampling are included in Appendix 1.

1.3 Closure Performance Standard

WPSC intends to clean close the former drum storage area to meet the OEPA requirements that hazardous waste and hazardous waste constituents be removed from the unit in accordance with the Closure Performance Standard of OAC Rule 3745-66-11, the Decontamination Standard of OAC Rule 3745-66-14, and the Closure and Post Closure requirements of OAC Rule 3745-66-97. The Closure Performance Standard also requires that WPSC implement measures that minimize further maintenance and protect human health and the environment.

2.0 GENERATOR CLOSURE PLAN

WPSC intends to clean close the storage pad, i.e., all waste and waste residues will be removed from the storage area, and the pad will be decontaminated. The following tasks will be conducted:

- Removal of remaining waste drums;
- Decontamination of storage pad;
- Verification of decontamination procedures;
- Inspection of storage pad; and
- Final closure certification.

2.1 Mobilization

Closure activities will be implemented by Wheeling Pittsburgh employees under the direction of Wheeling Pittsburgh's Area Environmental Coordinator. A Groundwater Technology, Inc. (GTI) Professional Engineer, or his designated representative, will periodically visit the site during closure to document that closure is accomplished in accordance with the generator closure plan. At a minimum, the PE, or his representative, will be present prior to initiation of closure activities and during decontamination of the pad and storm water catch basins. The P.E. (or his representative) will conduct the verification sampling, evaluate the results, and conduct the final inspection of the pad for cracks and corrosion.

2.2 Decontamination of Storage Pad and Storm Water Catch Basins

After the remaining drums are removed for disposal, the pad will be swept clean. A vac truck will be used to remove sediments from the two storm water catch basins. The dirt pile adjacent to the back of the warehouse will be removed. Recovered soils/debris will be loaded into roll-off boxes and tested for appropriate disposal by WPSC.

Following removal of loose soils/sediment from the storage area, the storage pad area will be decontaminated via a high pressure water wash. Temporary berms (straw bales covered with plastic sheeting) will be constructed around the perimeter of the 100-foot by 70-foot storage pad area to contain the wash water. Outlets from the storm water catch basins will be blocked to prevent wash waters from entering the storm sewer system. Decontamination wash waters will be directed to the blocked off storm sewers for containment and removal.

Decontamination will consist of a minimum of three washings consisting of a detergent water wash followed by two rinses with clean water. The initial washing with a detergent/water

solution will be followed by two water rinses using steam and/or high pressure water wash. The pad and storm water catch basins will be thoroughly flushed with water. Decontamination wash/rinse waters will be drummed and tested for appropriate disposal. If possible, decontamination wash and rinse waters will be discharged through the plant's wastewater treatment facility.

2.3 Verification Sampling

Rinseate samples will be collected following the third washing to verify that the decontamination procedures have been successful in reducing contaminant concentrations. Two final rinse samples will be collected, one from each storm water catch basin. Rinse samples will be collected using clean, dedicated polyethylene sample bottles attached to the end of a stainless steel pole. The pole will be lowered into each catch basin, filled with rinse water and retrieved. Rinseate will be poured from the bottle into laboratory pre-cleaned and pre-labeled sample bottles filled with appropriate preservative. The rinse samples will be analyzed for barium, cadmium, lead, xylene and ethylbenzene.

Results of the analyses will be compared to the rinse standard stipulated by the OEPA in the "Closure Plan Review Guidance" (OEPA, Division of Solid and Hazardous Waste Management, May, 1991). Based upon the criteria stipulated in this document, contaminant concentrations in the rinse cannot exceed 15 times the Maximum Contaminant Level (MCL) or Secondary Maximum Contaminant Level (SMCL) established by the USEPA for hazardous constituents.

The guidance document further stipulates that for parameters for which 15 times the MCL exceeds 1 mg/l, then the verification limit is defined as 1 mg/l. No provisions are given for parameters whose MCL exceeds 1 mg/l. Barium is identified as a contaminant of concern; however, the MCL for barium is 2 mg/l resulting in a verification limit of 30 mg/l. Since barium is a naturally occurring constituent and its MCL is set by the USEPA as 2 mg/l, the verification limit proposed for this closure is 30 mg/l.

The following table identifies the rinse limits for verification samples for contaminants of concern identified as a result of the drum sampling and soil sampling programs. If results of the third washing indicate that contaminants are present in excess of the limits, the pad and catch basins will be rinsed again and the rinse sampled and analyzed. If after the fourth washing the verification limits are not met, the OEPA will be contacted with the final rinse results.

Parameter	Maximum Contaminant Level (mg/l)	Verification Limit (mg/l)
Barium	2	30
Cadmium	0.010	0.15
Lead	0.050	0.75
Xylene	10	1
Ethylbenzene	0.7	1

2.4 Storage Pad Inspection

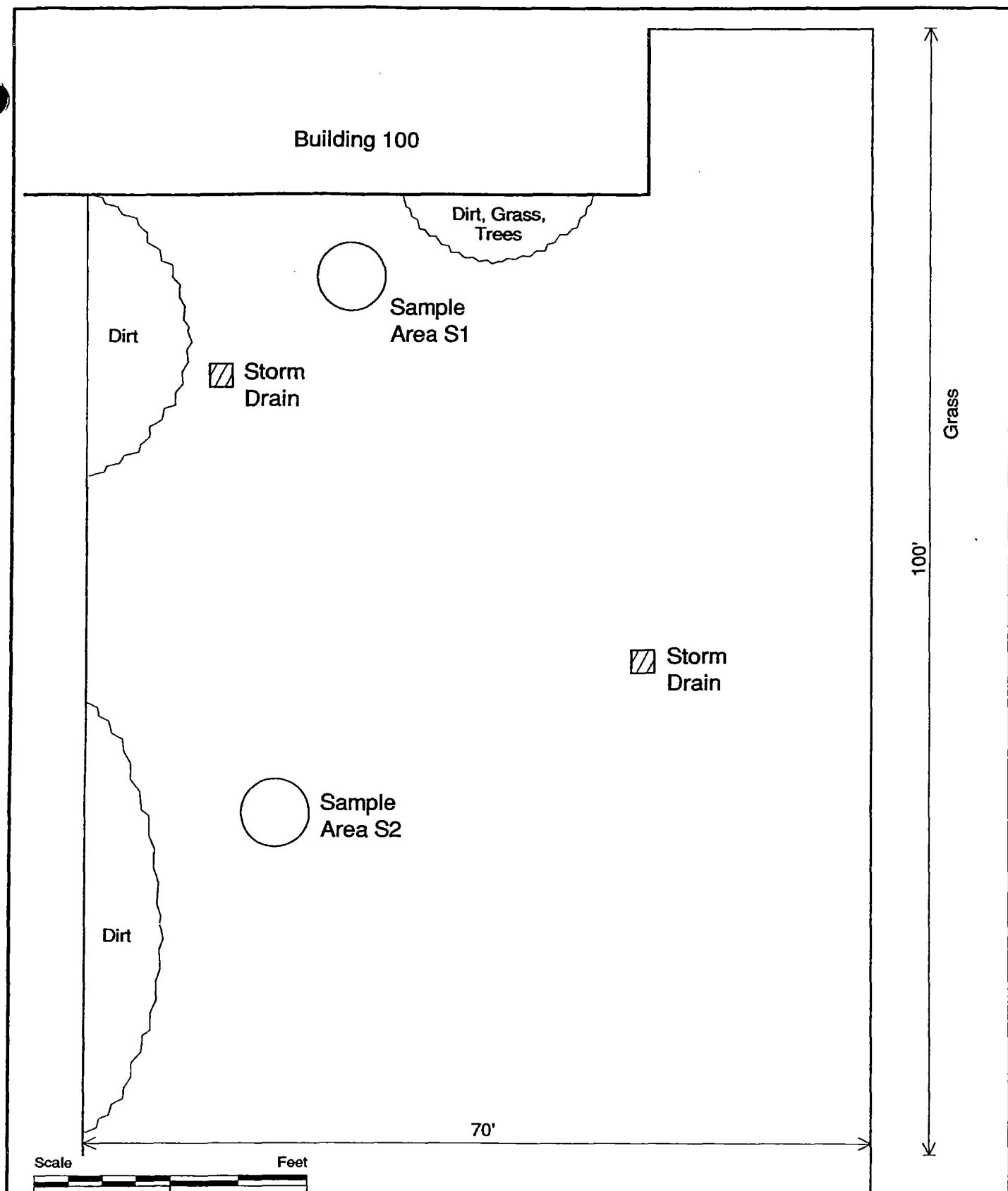
Following verification of decontamination, the storage pad will be inspected for corrosion and cracks. A nominal pad thickness will be obtained by measuring the thickness of the pad at 6 locations along the pad edges. A preliminary inspection of the pad indicates that there are minor cracks in the pavement; however, since the wastes were contained in drums, it is unlikely that the wastes migrated through the pad. The depth of the cracks and/or corroded areas will be measured with a ruler and, if the cracks and or/corrosion in the pad exceed the nominal thickness of the asphalt paving as determined above, additional verification procedures may be required. The OEPA will be notified and the generator closure plan modified to include additional verification testing.

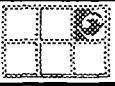
2.5 Final Closure Report

Closure procedures will be documented and a final closure report submitted to the OEPA for approval within 60 days of completion of closure activities. The closure report will include:

- A copy of the generator closure plan and copies of correspondence between WPSC and OEPA regarding closure activities;
- Narrative description of closure activities;
- Volume of waste and soils removed during closure and ultimate destination/disposal of the material;
- Results of verification testing and inspection;
- Analytical reports; and
- Photodocumentary log.

A discussion of post closure requirements will not be necessary since WPSC intends to clean close the storage pad area.



 GROUNDWATER TECHNOLOGY			PROJECT NO.: 040030374-01	Wheeling-Pittsburgh Steel Corporation Martins Ferry Plant Martins Ferry, Ohio Limits of Drum Storage Area
			FIGURE NO.:	
OWN BY: JT	CHK'D BY: MW	SCALE As Shown	Figure 1	
APPR BY:	DATE 7/11/95	FILE NAME wpscdsa		

**MARTINS FERRY PLANT
CLOSURE PLAN FOR DRUM STORAGE AREA
APPENDIX 1**

ANALYTICAL RESULTS

163-R4782
RECOVERY SERVICE
SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 1 OF 2
COMPLETED: 09/20/94
REVISED:
RUN: 09/21/94

ACCEPT FOR SHIPMENT

CH/SUBMITTER: 414503
PITTSBURGH



CONTROL #: 228696-2
LAB #: 97498-4
SAMPLE #: 352483

RATOR INFORMATION: CUSTOMER NUMBER: 4145-03-9596

WHEELING PITTSBURGH STEEL
1001 MAIN STREET
MARTINSFERRY, OH 43935

ATTN: LARRY BOROSKI

BRANCH: 414503 - PITTSBURGH

NAL DESCRIPTION: WASTE WATER

TRE OF BUSINESS: STEEL S.I.C.: STATUS: LQG

FEDERAL EPA ID: OHD010448231 STATE ID(S):

CILITY ADDRESS:

101 MAIN STREET
MARTINSFERRY, OH 43935

BILLING ADDRESS:

1134 MARKET ST
ACCTS PAYABLE
WHEELING, WV 26003

OESS DESCRIPTION: CLEAN TANK

GENERATION AMOUNT: 1000 GALLONS ONE TIME ONLY

.O. #:

DATE SURVEY SIGNED: 09/09/94

NACT: LARRY BOROSKI

TITLE: SUPT ENV & SERVICES PHN: 304-234-7250

REY COMMENTS:

HOT RUSH SAMPLE.

1363-R4782
RECOVERY SERVICE
SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 2 OF 4
COMPLETED: 09/20/94
REVISED:
RUN: 09/21/94

ACCEPT FOR SHIPMENT

RANCH/SUBMITTER: 414503
PITTSBURGH

CONTROL #: 228696-2
LAB #: 97498-4
SAMPLE #: 352483

CORPORATE REVIEW:

DISPOSITION: ACCEPT FOR SHIP PART NUMBER: 0082114 WASTE, THERM DESTRUCT
REVIEW DATE: 09/20/1994 REVIEWERS: MJK

APPROVED FACILITIES:

SAFETY-KLEEN CORP.
1722 COOPER CREEK ROAD
DENTON, TX 76208

FED EPA#: TXD077603371
STATE EPA#: 65124
TELEPHONE: 8173832611
STATE AUTH:

APPROVED DOT - SHIPPING DESCRIPTION

005003 DRUM OR BULK RQ WASTE CAUSTIC ALKALI LIQUIDS, N.O.S.
(SODIUM HYDROXIDE)
8 UN1719 PG II (D002) (ERG#60)

STATE/PROV. CODES: TX OUTS110H
EPA WASTE CODES: D002
USA

REVIEW COMMENTS:

*
* OK FOR THERMAL DESTRUCTION.
*
* NOT FOR NON-HAZ DUE TO PH.

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE
HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO
ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

RECOVERY SERVICE
SERVICES FUEL

COMPLETED: 09/20/94
REVISED:
RUN: 09/21/94

ACCEPT FOR SHIPMENT

CH/SUBMITTER: 414503
SBURGH

CONTROL #: 228696-2
LAB #: 97498-4
SAMPLE #: 352483

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : DK RED PINK PURPLE
WATER CONTENT : 32.5 WT%
NON-VOLATILE RESIDUE : 59.7 WT% DESCRIPTION: SLUDGE
FLAMMABILITY : NO FLASH AT 142 F BY SETAFLASH
FLAMMABILITY : NO FLASH AT 75 F BY SETAFLASH
EXTRACT BY METER 12.5
NEUTRALIZATION : 3.89 WT% OR 38.9 G/KG ALKALINITY AS NAOH
RADIOACTIVITY : NONE DETECTED
COMMENTS: H2O COMP:NEG

HEAT EVALUATION OF TOTAL SAMPLE

HEAT CONTENT : 10500 BTU/LB ASH UPON COMBUSTION : 5.3 WT%
TOTAL SULFUR S : 0.1 TOTAL BROMINE BR: < 0.1 WT%
TOTAL CHLORINE CL < 0.1 TOTAL FLUORINE F : < 0.1 WT%

ELEMENTAL CONTENT OF TOTAL SAMPLE (PPM): DIGEST BY: ICP

IRON	FE:	19	MAGNESIUM	MG:	121
PHOSPHORUS	P :	382	ANTIMONY	SB: <	15
ZINC	ZN:	59	SILVER (D011)	AG: <	1
ARSENIC (D004)	AS: <	10	BARIUM (D005)	BA: <	20
BERYLLIUM	BE: <	2	CADMIUM (D006)	CD: <	3
CHROMIUM (D007)	CR: <	2	COPPER	CU: <	3
MERCURY (D009)	HG: <	10	NICKEL	NI: <	4
LEAD (D008)	PB: <	5	SELENIUM (D010)	SE: <	20
TITANIUM	TI: <	10	THALLIUM	TL: <	30

GENERAL COMPOSITION:	COMPOSITION BY:	APPEARANCE (VOL%)	TOTAL (WT%)
AQUEOUS PHASE (FREE WATER).....		0.0	0.0
ORGANIC PHASE (FEEDSTOCK).....		100.0	100.0
BOTTOM SLUDGE (SEMISOLIDS).....		0.0	0.0
BOTTOM SOLID (SETTLED SOLIDS).....		0.0	0.0
TOTAL		100.0	100.0

TOTAL PHASE SPECIFIC GRAVITY: .980 VISCOSITY (CENTIPOISE): 60 CPS

SPECIFIC COMPOSITION OF TOTAL SAMPLE	COMPOSITION OF:	TOTAL SAMPLE (WT%)	TOTAL SAMPLE (WT%)
WATER CONTENT.....		32.5	32.5
NON-VOLATILE RESIDUE	DESCRIPTION: SLUDGE	59.7	59.7
VOLATILE ORGANICS BY DIFFERENCE.....		7.8	7.8
TOTAL		100.0	100.0

ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4/82

OIL RECOVERY SERVICE
OIL SERVICES FUEL

FREQUENCY OF ANALYSIS

COMPLETED: 09/20/94

REVISED:

RUN: 09/21/94

ACCEPT FOR SHIPMENT

CONTROL #: 228696-2
LAB #: 97498-4
SAMPLE #: 352483

BRANCH/SUBMITTER: 414503
PITTSBURGH

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY
SAMPLE PREPARATION METHODS: OTHER
DETECTION METHODS : FID, FID

COMPOUND NAME	COMPOSITION OF:	VOLATILE ORGANICS (WT%)	TOTAL SAMPLE (WT%)
NO VOLATILE ORGANICS DETECTED (<0.1% EACH)		100.0	7.8
CODE: NONE CAS NUMBER:			
TOTAL		100.0	7.8

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

ADDTNL ANALYTICAL INFO: NEUTRALIZED SAMPLE BEFORE ANALYSIS

LABORATORY REVIEW: A SEG CODE: REVIEWERS: JA JA LAB: SK TECHNICAL CTR
RELEASED: 09/20/94 ANALYZED: 09/20/94 SUBMITTED: 09/13/94

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF
QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN
ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED UNDER 40 CFR PART 268.

WASTE CODES FOR LDR: D002

ANALYSIS DOES NOT INDICATE THAT MATERIAL IS CALIFORNIA LIST HALOGENATED ORGANIC
COMPOUND WASTE.

*** ACCEPT FOR SHIPMENT

END OF DOCUMENT

TO: SAFETY-KLEEN CORP. EPA ID NO: TXD077603371
1722 COOPER CREEK ROAD DENTON, TX 76208

Under manifest number _____ line number _____ (enter 11a, 11b, 11c, OR 11d) the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA WASTE CODES: D002

F001-F005 Spent Solvents	TREATMENT STANDARDS (total mg/l, except as noted by TCLP)			
	Wastewater W/Solvents	Check All That apply	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent				
Acetone	0.28	_____	160	_____
Benzene	0.07	_____	3.7	_____
N-Butyl alcohol	5.6	_____	2.6	_____
Carbon disulfide	0.014	_____	4.8	TCLP _____
Carbon tetrachloride	0.057	_____	5.6	_____
Chlorobenzene	0.057	_____	5.7	_____
Cresol (m- and p-isomers)	0.77	_____	3.2	_____
o-Cresol	0.11	_____	5.6	_____
Cyclohexanone	0.36	_____	0.75	TCLP _____
o-Dichlorobenzene	0.088	_____	6.2	_____
Ethyl acetate	0.34	_____	33	_____
Ethyl benzene	0.057	_____	6.0	_____
Ethyl ether	0.12	_____	160	_____
Isobutyl alcohol	5.6	_____	170	_____
Methanol	5.6	_____	0.75	TCLP _____
Methylene chloride	0.089	_____	33	_____
Methylene chloride (from Pharm. Industry)	0.44	_____	33	_____
Methyl ethyl ketone	0.28	_____	36	_____
Methyl isobutyl ketone	0.14	_____	33	_____
Nitrobenzene	0.068	_____	14	_____
Pyridine	0.014	_____	16	_____
Tetrachloroethylene	0.056	_____	5.6	_____
Toluene	0.08	_____	28	_____
1,1,1-Trichloroethane	0.054	_____	5.6	_____
1,1,2-Trichloroethane	0.03	_____	7.6	_____
1,1,2-Trichloro-1,2,2-trifluoroethane	0.057	_____	28	_____
Trichloroethylene	0.054	_____	5.6	_____
Trichloromonofluoromethane	0.02	_____	33	_____
Xylenes (total)	0.32	_____	28	_____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration*	_____
Nickel (Ni)	134.0	None	_____
Thallium (Tl)	130.0	None	_____
Chlorinated Biphenyls (PCB's)	50.0	Incineration	_____

* These treatment standards do not preclude solvent recovery or use as fuel prior to land disposal.

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)		Check All That Apply
Waste code	Description	Wastewaters	Nonwastewaters	
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA	_____
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT	_____
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS.	FSUBS, OR INCIN _____
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT	X _____
D004	Arsenic (As)	268.43(a)	268.41(a)	_____
D005	Barium (Ba)	268.43(a)	268.41(a)	_____
D006	Cadmium (Cd)	268.43(a)	268.41(a)	_____
D007	Chromium (Cr)	268.43(a)	268.41(a)	_____
D008	Lead (Pb)	268.43(a)	268.41(a)	_____
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a)	_____
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC	_____
D010	Selenium (Se)	268.43(a)	268.41(a)	_____
D011	Silver (Ag)	268.43(a)	268.41(a)	_____
F005	2-Ethoxyethanol	268.42(a) INCIN*	268.42(a) INCIN*	_____
F005	2-Nitropropane	268.42(a) INCIN*	268.42(a) INCIN*	_____
Other Codes See attachment for supplemental list				_____

This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45 for the above contaminants that are subject to treatment. (check if applicable) _____

Generator Name: WHEELING PITTSBURGH STEEL EPA ID: QH0010448231

Generator Signature: _____ Name & Title: _____

Safety-Kleen Sample Number: 352483 Control Number: 0228896-2

NOTE: The USEPA has not determined treatment standards for the new TCLP EPA Waste Numbers: D018 through D043.

1363-R4782
RECOVERY SERVICE
WHEELING PITTSBURGH STEEL

PREQUALIFICATION EVALUATION
MANIFEST INFORMATION

RUN: 09/21/94
CONTROL #: 228696-2
SAMPLE #: 352483

REQUIRED MANIFEST FORM: TX

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

1. FORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO. OHD010448231	DOCUMENT NO.	2. PAGE 1	UNDERLINED AREAS ARE REQUIRED
3. GENERATOR NAME AND MAILING ADDRESS WHEELING PITTSBURGH STEEL 1001 MAIN ST MARTINS FERRY OH 43935		A. STATE MANIFEST DOCUMENT NO. PREPRINTED ON FORM		
4. GENERATOR PHONE 304 234 7243		B. STATE GENERATOR ID		
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TRANS ID D. TRANSPORTER PHONE 3042336567		
7. TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TRANS ID F. TRANSPORTER PHONE		
9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 1722 COOPER CREEK ROAD DENTON, TX 76208		10. US EPA ID NUMBER TXD077603371	G. FACILITY STATE ID 65124 H. FACILITY PHONE 817 383 2611	
11. US DOT DESCRIPTION A. RQ WASTE CAUSTIC ALKALI LIQUIDS, N.O.S. (SODIUM HYDROXIDE) 8 UN1719 PG 11 (D002)(ERG#60)		CONTAINER	I. WASTE NO OUTS110H	
J. ADDITIONAL DESCRIPTION FOR THE MATERIALS LISTED ABOVE 1A) D002			K. HANDLING CODES	
15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION EMERGENCY RESP# 708-888-4660				

ATTACHMENT "B"

363-R4503 (REFRINT)
L RECOVERY SERVICE
E SERVICES FUEL

REGISTRATION EVALUATION

COMPLETED: 09/19/94
REVISED: 09/22/94
RUN: 09/22/94

ACCEPT FOR SHIPMENT



CONTROL #: 228698-6
LAB #: 97500-8
SAMPLE #: 352488

BRANCH/SUBMITTER: 414503
PITTSBURGH

REGISTRAR INFORMATION: CUSTOMER NUMBER: 4145-03-9596

WHEELING PITTSBURGH STEEL
1001 MAIN STREET
MARTINSFERRY, OH 43935

ATTN: LARRY BOROSKI

BRANCH: 414503 - PITTSBURGH

GENERAL DESCRIPTION: GREASE

NATURE OF BUSINESS: STEEL

S.I.C.:

STATUS: LQG

FEDERAL EPA ID: OHD010448231 STATE ID(S):

FACILITY ADDRESS: MANIFEST

BILLING ADDRESS:

1001 MAIN STREET

1134 MARKET ST

MARTINSFERRY, OH 43935

ACCTS PAYABLE

WHEELING, WV 26003

PROCESS DESCRIPTION: CHANGE EQUIP

GENERATION AMOUNT: 165 GALLONS ONE TIME ONLY

P.O. #: VERBAL

DATE SURVEY SIGNED: 09/09/94

CONTACT: LARRY BOROSKI

TITLE: SUPT ENV & SVC

PHN: 304-234-7250

ADDITIONAL COMMENTS:

HOT RUSH SAMPLE. PLEASE CHECK FOR NON-HAZ, IF NOT FOR FRS HAZ WASTE.

ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

1363-R4505 (REPRINT)
RECOVERY SERVICE
SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 2 OF 4
COMPLETED: 09/19/94
REVISED: 09/22/94
RUN: 09/22/94

ACCEPT FOR SHIPMENT

CONTROL #: 228698-6
LAB #: 97500-8
SAMPLE #: 352488

BRANCH/SUBMITTER: 414503
PITTSBURGH

CORPORATE REVIEW:

DISPOSITION: ACCEPT FOR SHIP PART NUMBER: 0082112 WASTE, NON-PUMP -55
VIEW DATE: 09/16/1994 REVIEWERS: AAD

APPROVED FACILITIES:

SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD, KY 40068

FED EPA#: KYD053348108

STATE EPA#:

TELEPHONE: 5028452453

STATE AUTH:

APPROVED DOT - SHIPPING DESCRIPTION

()01055 DRUM OR BULK

NOT REGULATED BY USDOT OR USEPA.
DESCRIPTION SHOULD BE REFLECTIVE
OF THE WASTE STREAM.

USEPA WASTE CODES: NONE
USA

REVIEW COMMENTS:

*
* OK FOR NONPUMPABLE FUEL.
*
* THE LAB HAS RECEIVED A GENERATOR CERTIFICATION FORM FOR NONHAZARDOUS
* APPROVAL.
*
* PROPER SHIPPING DESCRIPTION WAS BASED ON THIS SINGLE ANALYSIS. GENERATOR
* MUST CERTIFY THAT SHIPMENT IS NOT HAZARDOUS. PER COMPANY POLICY, FRS
* CUSTOMERS MUST COMPLETE GENERATOR CERTIFICATION WITH EACH SHIPMENT
* AND BRANCH WILL FILE IN CUSTOMER RECORDS.
*
* RECD GEN CERT FORM 9/22/94

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE
HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO
ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

ACCEPT FOR SHIPMENT

ARCH/SUBMITTER: 414503
 TTSBURGH

CONTROL #: 228698-6
 LAB #: 97500-8
 SAMPLE #: 352488

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : YELLOW-LT BROWN
 WATER CONTENT : 5.7 WT%
 NON-VOLATILE RESIDUE: 84.4 WT% DESCRIPTION: SLUDGE
 FLAMMABILITY : NO FLASH AT 142 F BY SETAFLASH
 FLAMMABILITY : NO FLASH AT 75 F BY SETAFLASH
 EXTRACT BY METER 4.9
 RADIOACTIVITY : NONE DETECTED
 COMMENTS: H2O COMP:NEG

HEAT EVALUATION OF TOTAL SAMPLE

HEAT CONTENT : 17700 BTU/LB ASH UPON COMBUSTION : < 1.0 WT%
 TOTAL BROMINE BR < 0.1 TOTAL CHLORINE CL: < 0.1 WT%
 TOTAL FLUORINE F < 0.1 TOTAL SULFUR S : < 0.1 WT%

GENERAL COMPOSITION:	COMPOSITION BY:	APPEARANCE (VOL%)	TOTAL (WT%)
AQUEOUS PHASE (FREE WATER).....		0.0	0.0
ORGANIC PHASE (FEEDSTOCK).....		0.0	0.0
BOTTOM SLUDGE (SEMISOLIDS).....		100.0	100.0
BOTTOM SOLID (SETTLED SOLIDS).....		0.0	0.0
TOTAL		100.0	100.0
TOTAL PHASE	SPECIFIC GRAVITY: 1.350	VISCOSITY (CENTIPOISE):	4500 CPS

SPECIFIC COMPOSITION OF TOTAL SAMPLE	COMPOSITION OF:	TOTAL SAMPLE (WT%)	TOTAL SAMPLE (WT%)
WATER CONTENT.....		5.7	5.7
NON-VOLATILE RESIDUE	DESCRIPTION: SLUDGE	84.4	84.4
VOLATILE ORGANICS BY DIFFERENCE.....		9.9	9.9
TOTAL		100.0	100.0

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: CS2-EXTRACT
 DETECTION METHODS : FID, FID

COMPOUND NAME	COMPOSITION OF:	VOLATILE ORGANICS (WT%)	TOTAL SAMPLE (WT%)
MEDIUM-BOILING ALIPHATIC HYDROCARBONS (C9-C13)		61.9	6.1
CODE: MHC CAS NUMBER: 8030-30-6			
HIGH-BOILING ALIPHATIC HYDROCARBONS (C14-C20)		38.1	3.8
CODE: HHC CAS NUMBER:			
TOTAL		100.0	9.9

1363-R4505 (REPRINT)
RECOVERY SERVICE
SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 7 OF 7
COMPLETED: 09/19/94
REVISED: 09/22/94
RUN: 09/22/94

ACCEPT FOR SHIPMENT

ANCH/SUBMITTER: 414503
PITTSBURGH

CONTROL #: 228698-6
LAB #: 97500-8
SAMPLE #: 352488

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: A SEG CODE: REVIEWERS: AJ AJ LAB: SK TECHNICAL CTR
RELEASED: 09/16/94 ANALYZED: 09/16/94 SUBMITTED: 09/13/94

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF
QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN
ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

REVISION NOTES ** (09/22/94) **

DISPOSITION FROM:R

TO:A

SK DOT# FROM:00000000

TO:0001055

PORT NUM FROM:0000000000

TO:0082112

WASTE CODE FROM:

TO:NONE

COUNTRY FROM:

TO:USA

APP FACILITY FROM: 000000

TO:000658

SD COMMENTS FROM:NONHZ

TO:

GENCT 777 NPF

MANUAL COMMENT ADDED

RECD GEN CERT FORM 9/22/94

*** ACCEPT FOR SHIPMENT

END OF DOCUMENT

163-R4505

RECOVERY SERVICE
WHEELING PITTSBURGH STEELPREQUALIFICATION EVALUATION
MANIFEST INFORMATION

RUN: 09/22/94

CONTROL #: 228698-6
SAMPLE #: 352488

MANIFEST FORM: GN

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL USES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

FORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO. OHD010448231	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>	
GENERATOR NAME AND MAILING ADDRESS WHEELING PITTSBURGH STEEL 7001 MAIN ST MARTINS FERRY OH 43935 GENERATOR PHONE 304 234 7243			A. STATE MANIFEST DOCUMENT NO B. STATE GENERATOR ID		
TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TRANS ID D. TRANSPORTER PHONE 3042336567			
TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TRANS ID F. TRANSPORTER PHONE			
FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD KY 40068		10. US EPA ID NUMBER KYD053348108		G. FACILITY STATE ID H. FACILITY PHONE 502 845 2453	
I. US DOT DESCRIPTION NOT REGULATED BY USDOT OR USEPA. DESCRIPTION SHOULD BE REFLECTIVE OF THE WASTE STREAM.		CONTAINER	I. WASTE NO		
J. ADDITIONAL DESCRIPTION FOR THE MATERIALS LISTED ABOVE				K. HANDLING CODES	
5. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION EMERGENCY RESP# 708-888-4660					

ATTACHMENT "C"

ANTECH LTD.
CASE NARRATIVE

I. GENERAL:

A: PROJECT NUMBERS:

ANTECH LTD.: 94-3909

CLIENT: Purchase Order No. B 9409-09365

B: SAMPLE IDENTIFICATIONS:

ANTECH LTD.: 9410-0590

CLIENT: Waste Acid

C: SHIPPING/RECEIVING COMMENTS:

None

II. PREPARATION/ANALYSIS COMMENTS:

A: PREPARATION:

None

B: GENERAL CHEMISTRY:

None

C: METALS:

Results are corrected for specific gravity.

D: ORGANICS:

1. VOLATILES:

None

2. SEMIVOLATILES:

None

3. PCBS:

None

III. GENERAL COMMENTS:

Trailing zeroes and decimal places appearing on the data should not be interpreted as precision of the analytical procedure, but rather as a result of reporting format. Please refer to the enclosed TCLP Regulatory Levels table for appropriate regulatory levels and hazardous waste numbers.

Table 1
General Data Table
Wheeling-Pittsburgh Steel Corporation
Antech Ltd. Project No. 94-3909
Waste Characterization; Waste Characterization
Purchase Order No. B 9409 09365; Yorkville, OH

Parameter	Analytical Method	Units	Sample Identification	
			9410-0590 Waste Acid (9/16/94)	9410-0591 Method Blank (9/16/94)
Cyanide (Total)	9012(1)	mg/kg	<1.0	<1.0
Flash Point	1010(1)	°F	>200	NAP(2)
Paint Filter	9095(1)	%	99	NAP
pH	9045(1)	pH units	<1.00	NAP
Sulfide (Reactive)	7.3.4.1/9030(1)	mg/kg	<10	NAP
Polychlorinated Biphenyls	8080(1)	mg/kg	<1.0	<1.0
TCLP Metals: (3)				
Silver (TCLP)	6010(1)	mg/l	<0.10	<0.10
Arsenic (TCLP)	6010(1)	mg/l	<0.10	<0.10
Barium (TCLP)	6010(1)	mg/l	<10	<10
Cadmium (TCLP)	6010(1)	mg/l	<0.10	<0.10
Chromium (TCLP)	6010(1)	mg/l	3.7	<0.10
Mercury (TCLP)	7470(1)	mg/l	<0.010	<0.010
Lead (TCLP)	6010(1)	mg/l	<0.10	<0.10
Selenium (TCLP)	7740(1)	mg/l	<0.10	<0.10
TCLP Extraction Fluid Data:				
Extraction Fluid	1311(1)	-	No.1	No.1
pH with Deionized Water		pH units	NAP	NAP
pH After Addition of 1 Normal HCL		pH units	NAP	NAP
pH of TCLP Extract		pH units	1.24	4.93
Amount of Sample Extracted		g	NAP	NAP

(1) U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

(2) NAP - Not applicable.

(3) TCLP - Toxicity Characteristic Leaching Procedure.

Table 2
TCLP(1) Organic Analyses
Wheeling-Pittsburgh Steel Corporation
Antech Ltd. Project No. 94-3909
Waste Characterization; Waste Characterization
Purchase Order No. B 9409 09365; Yorkville, OH

Parameter	CAS(2) Number	Units	Sample Identification	
			9410-0590 Waste Acid (9/16/94)	9410-0591 Method Blank (9/16/94)
TCLP Volatile Organic Analyses:(8260)(3)				
Benzene	71-43-2	µg/l	<50	<50
2-Butanone	78-93-3	µg/l	<5000	<5000
Carbon tetrachloride	56-23-5	µg/l	<50	<50
Chlorobenzene	108-90-7	µg/l	<1000	<1000
Chloroform	67-66-3	µg/l	<500	<500
1,2-Dichloroethane	107-06-2	µg/l	<50	<50
1,1-Dichloroethene	75-35-4	µg/l	<50	<50
Tetrachloroethene	127-18-4	µg/l	<50	<50
Trichloroethene	79-01-6	µg/l	<50	<50
Vinyl chloride	75-01-4	µg/l	<50	<50
TCLP Base/Neutral Extractables:(8270)(3)				
1,4-Dichlorobenzene	106-46-7	µg/l	<500	<500
2,4-Dinitrotoluene	121-14-2	µg/l	<100	<50
Hexachlorobutadiene	87-68-3	µg/l	<100	<50
Hexachlorobenzene	118-74-1	µg/l	<100	<100
Hexachloroethane	67-72-1	µg/l	<500	<500
Nitrobenzene	98-95-3	µg/l	<100	<100
Pyridine	110-86-1	µg/l	<500	<500
TCLP Acid Extractables:(8270)(3)				
Total Cresol (TCLP)	(4)	µg/l	<5000	<5000
Pentachlorophenol	87-86-5	µg/l	<5000	<5000
2,4,5-Trichlorophenol	95-95-4	µg/l	<5000	<5000
2,4,6-Trichlorophenol	88-06-2	µg/l	<100	<100

(1)TCLP - Toxicity Characteristic Leaching Procedure.

(2)CAS - Chemical Abstracts Services.

(3)U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

(4)m-Cresol 108-39-4, o-Cresol 95-48-7, and p-Cresol 106-44-5.

**Toxicity Characteristic Leaching Procedure (TCLP)
Regulatory Levels**

Contaminant	Regulatory Level (mg/l)	USEPA Hazardous Waste Number
Arsenic	5.0	D004
Barium	100.0	D005
Cadmium	1.0	D006
Chromium	5.0	D007
Lead	5.0	D008
Mercury	0.2	D009
Selenium	1.0	D010
Silver	5.0	D011
Endrin	0.02	D012
Lindane	0.4	D013
Methoxychlor	10.0	D014
Toxaphene	0.5	D015
2,4-D	10.0	D016
2,4,5-TP (silvex)	1.0	D017
Benzene	0.5	D018
Carbon Tetrachloride	0.5	D019
Chlordane	0.03	D020
Chlorobenzene	100.0	D021
Chloroform	6.0	D022
o-Cresol	200.0	D023
m-Cresol	200.0	D024
p-Cresol	200.0	D025
Cresol	200.0	D026
1,4-Dichlorobenzene	7.5	D027
1,2-Dichloroethane	0.5	D028
1,1-Dichloroethene	0.7	D029
2,4-Dinitrotoluene	0.13	D030
Heptachlor (and its epoxide)	0.008	D031
Hexachlorobenzene	0.13	D032
Hexachlorobutadiene	0.5	D033
Hexachloroethane	3.0	D034
2-Butanone	200.0	D035
Nitrobenzene	2.0	D036
Pentachlorophenol	100.0	D037
Pyridine	5.0	D038
Tetrachloroethene	0.7	D039
Trichloroethene	0.5	D040
2,4,5-Trichlorophenol	400.0	D041
2,4,6-Trichlorophenol	2.0	D042
Vinyl Chloride	0.2	D043

ANTECH LTD.
CASE NARRATIVE

I. GENERAL:

A: PROJECT NUMBERS:

ANTECH LTD.: 94-4193

CLIENT: 1056-02

B: SAMPLE IDENTIFICATIONS:

ANTECH LTD.: 9410-2412

CLIENT: Waste Acid

C: SHIPPING/RECEIVING COMMENTS:

None

II. PREPARATION/ANALYSIS COMMENTS:

A: PREPARATION:

None

B: METALS:

None

III. GENERAL COMMENTS:

Trailing zeroes and decimal places appearing on the data should not be interpreted as precision of the analytical procedure, but rather as a result of reporting format.

Table 1
General Data Table
EPA Method 6010(1)
Wheeling-Pittsburgh Steel Corporation
Antech Ltd. Project No. 94-4193
Waste Characterization; 1056-02

Antech Sample ID	Client Sample ID	Date Collected	Parameter Identification
			Phosphorous (Total) mg/kg
9410-2412	Waste Acid	9/16/94	380000
9410-2413	Method Blank	10/24/94	<1.0

1) U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

ATTACHMENT "D"

ITS WASHER SERVICE
RECOVERY SERVICES

COMPLETED: 09/19/94
REVISED:
RUN: 09/21/94

ACCEPT FOR SHIPMENT



BRANCH/SUBMITTER: 414503
PITTSBURGH

CONTROL #: 228693-5
LAB #: 97495-7
SAMPLE #: 352486

OPERATOR INFORMATION: CUSTOMER NUMBER: 4145-03-9596

WHEELING PITTSBURGH STEEL
1001 MAIN STREET
MARTINSFERRY, OH 43935

ATTN: LARRY BOROSKI

BRANCH: 414503 - PITTSBURGH

GENERAL DESCRIPTION: PAINT WASTE

TYPE OF BUSINESS: STEEL

S.I.C.:

STATUS:

FEDERAL EPA ID: OHD010448231 STATE ID(S):

FACILITY ADDRESS: MANIFEST

BILLING ADDRESS:

1001 MAIN STREET

1134 MARKET ST

MARTINSFERRY, OH 43935

ACCTS PAYABLE

WHEELING, WV 26003

PROCESS DESCRIPTION: BUILDING MAINTANCE

GENERATION AMOUNT: 110 GALLONS YEARLY

NO. #: VERBAL

DATE SURVEY SIGNED: 09/09/94

CONTACT: LARRY BOROSKI

TITLE: SUPT ENV & SERVICES PHN: 304-234-7250

REMARKS COMMENTS:

HOT RUSH SAMPLE.

REPORT REVIEW:

POSITION: ACCEPT FOR SHIP

PART NUMBER: 0082112 WASTE, NON-PUMP -55

REVIEW DATE: 09/14/1994

REVIEWERS: AAD

PROVED FACILITIES:

SAFETY-KLEEN CORP.

SAFETY-KLEEN CORP.

633 E 138TH ST

3700 LAGRANGE ROAD

DOLTON, IL 60419

SMITHFIELD, KY 40068

FED EPA#: ILD980613913

KYD053348108

STATE EPA#: 0310690006

TELEPHONE: 7088494850

5028452453

STATE AUTH: 000161

PROVED DOT - SHIPPING DESCRIPTION

001153 DRUM OR BULK

RQ WASTE PAINT RELATED MATERIAL

3 UN1263 PG III

(F003)(ERG#26)

HAZARD WASTE CODES: F003 D001

USA

VIEW COMMENTS:

* *****

OK FOR NONPUMPABLE FUEL.

* *****

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE
IS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO
ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

* ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

ARTS WASHER SERVICE
IID RECOVERY SERVICES

COMPLETED: 09/19/94

REVISED:

RUN: 09/21/94

ACCEPT FOR SHIPMENT

ANCH/SUBMITTER: 414503
PITTSBURGH

CONTROL #: 228693-5
LAB #: 97495-7
SAMPLE #: 352486

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : BLACK-BLUE
WATER CONTENT : 71.8 WT%
NON-VOLATILE RESIDUE: 28.2 WT% DESCRIPTION: SOLID
FLAMMABILITY : FLASHED AT 140 F BY SETAFLASH
FLAMMABILITY : NO FLASH AT 75 F BY SETAFLASH
PH : EXTRACT BY METER 6.1
RADIOACTIVITY : NONE DETECTED
COMMENTS: H2O COMP:NEG,BULK DENSITY

EL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT : 10200 BTU/LB ASH UPON COMBUSTION : 1.1 WT%
TOTAL BROMINE BR < 0.1 TOTAL CHLORINE CL: < 0.1 WT%
TOTAL FLUORINE F < 0.1 TOTAL SULFUR S : < 0.1 WT%

GENERAL COMPOSITION:

COMPOSITION BY:

APPEARANCE
(VOL%)

TOTAL
(WT%)

AQUEOUS PHASE (FREE WATER).....	10.0	10.0
ORGANIC PHASE (FEEDSTOCK).....	0.0	0.0
BOTTOM SLUDGE (SEMISOLIDS).....	90.0	90.0
BOTTOM SOLID (SETTLED SOLIDS).....	0.0	0.0

TOTAL	100.0	100.0
-------	-------	-------

BOTTOM SLUDGE SPECIFIC GRAVITY: 1.050	VISCOSITY (CENTIPOISE):	8400 CPS
AQUEOUS PHASE SPECIFIC GRAVITY:	VISCOSITY (CENTIPOISE): <	50 CPS

SPECIFIC COMPOSITION OF TOTAL SAMPLE

COMPOSITION OF:

TOTAL
SAMPLE
(WT%)

TOTAL
SAMPLE
(WT%)

WATER CONTENT.....	71.8	71.8
NON-VOLATILE RESIDUE DESCRIPTION: SOLID	28.2	28.2
VOLATILE ORGANICS BY DIFFERENCE.....	0.0	0.0
TOTAL	100.0	100.0

** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

WTS WASHER SERVICE
RECOVERY SERVICES

COMPLETED: 09/19/94
REVISED:
RUN: 09/21/94

ACCEPT FOR SHIPMENT

SHIP/SUBMITTER: 414503
PITTSBURGH

CONTROL #: 228693-5
LAB #: 97495-7
SAMPLE #: 352486

FILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY
SAMPLE PREPARATION METHODS: CS2-EXTRACT
DETECTION METHODS : FID, FID

COMPOSITION OF:	VOLATILE ORGANICS (WT%)	TOTAL SAMPLE (WT%)
LOW-BOILING ALIPHATIC HYDROCARBONS (C9-C13)	65.9	0.0
CODE: MHC CAS NUMBER: 8030-30-6		
ENES (ORTHO-, META-, AND PARA-)	24.4	0.0
CODE: XYLS CAS NUMBER: 1330-20-7		
MONOBENZENE	4.8	0.0
CODE: ETB CAS NUMBER: 100-41-4		
TOTAL OTHERS (<1.0% EACH)	2.6	0.0
CODE: TO CAS NUMBER:		
HIGH BOILING ALIPHATIC HYDROCARBONS (C5-C8)	2.3	0.0
CODE: LHC CAS NUMBER: 64741-89-5		
TOTAL	100.0	0.0

SPECIFIC ORGANIC COMPOSITION
POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: A SEG CODE: REVIEWERS: AJ AJ LAB: SK TECHNICAL CTR
RELEASED: 09/16/94 ANALYZED: 09/16/94 SUBMITTED: 09/13/94
COMMENTS: WATER BY DIFFERENCE.

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF
QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN
ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED UNDER 40 CFR PART 268.
WASTE CODES FOR LDR: F003 D001
ANALYSIS DOES NOT INDICATE THAT MATERIAL IS CALIFORNIA LIST HALOGENATED ORGANIC
COMPOUND WASTE.
F001-F005 COMPOUND CODES FOR LDR NOTICE: ETB XYLS

ACCEPT FOR SHIPMENT

END OF DOCUMENT

63-R4505
WASHER SERVICE
WHEELING PITTSBURGH STEEL

PREQUALIFICATION EVALUATION
MANIFEST INFORMATION

REVISED:

RUN: 09/21/94

CONTROL #: 228693-5
SAMPLE #: 352486

RED MANIFEST FORM: IL

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

FORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO. OHD010448231	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>
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GENERATOR NAME AND MAILING ADDRESS WHEELING PITTSBURGH STEEL 001 MAIN ST MARTINS FERRY OH 43935 GENERATOR PHONE 304 234 7243	A. STATE MANIFEST DOCUMENT NO PREPRINTED ON FORM B. STATE GENERATOR ID _____
--	---

TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TRANS ID D. TRANSPORTER PHONE 3042336567
---	---------------------------------	---

TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TRANS ID F. TRANSPORTER PHONE
-----------------------	-----------------	--

FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 633 E 138TH ST DOLTON, IL 60419	10. US EPA ID NUMBER ILD980613913	G. FACILITY STATE ID 0310690006 H. FACILITY PHONE 708 849 4850
--	--------------------------------------	---

US DOT DESCRIPTION	CONTAINER	I. WASTE NO
--------------------	-----------	-------------

RQ WASTE PAINT RELATED MATERIAL 3 UN1263 PG III (F003)(ERG#26)		F003 000161
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ADDITIONAL DESCRIPTION FOR THE MATERIALS LISTED ABOVE IA) D001	K. HANDLING CODES
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5. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

EMERGENCY RESP# 708-888-4660

TO: SAFETY-KLEEN CORP.

EPA ID NO: ILD980813913

833 E 138TH ST

DOLTON, IL 60419

- Under manifest number _____ line number _____ (enter 11a, 11b, 11c, OR 11d) the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA WASTE CODES: F003 D001

F001-F005 Spent SolventsTREATMENT STANDARDS (total mg/l, except as noted by TCLP)

Regulated Hazardous Constituent	Wastewater W/Solvents	Check All That apply	All Other Solvent Wastes	Check All That Apply
Acetone	0.28	_____	160	_____
Benzene	0.07	_____	3.7	_____
N-Butyl alcohol	5.6	_____	2.6	_____
Carbon disulfide	0.014	_____	4.8	TCLP _____
Carbon tetrachloride	0.057	_____	5.6	_____
Chlorobenzene	0.057	_____	5.7	_____
Cresol (m- and p-isomers)	0.77	_____	3.2	_____
o-Cresol	0.11	_____	5.6	_____
Cyclohexanone	0.36	_____	0.75	TCLP _____
o-Dichlorobenzene	0.088	_____	6.2	_____
Ethyl acetate	0.34	_____	33	_____
Ethyl benzene	0.057	_____	6.0	X _____
Ethyl ether	0.12	_____	160	_____
Isobutyl alcohol	5.6	_____	170	_____
Methanol	5.6	_____	0.75	TCLP _____
Methylene chloride	0.089	_____	33	_____
Methylene chloride (from Pharm. Industry)	0.44	_____	33	_____
Methyl ethyl ketone	0.28	_____	36	_____
Methyl isobutyl ketone	0.14	_____	33	_____
Nitrobenzene	0.068	_____	14	_____
Pyridine	0.014	_____	16	_____
Tetrachloroethylene	0.056	_____	5.6	_____
Toluene	0.08	_____	28	_____
1,1,1-Trichloroethane	0.054	_____	5.6	_____
1,1,2-Trichloroethane	0.03	_____	7.6	_____
1,1,2-Trichloro-1,2,2-trifluoroethane	0.057	_____	28	_____
Trichloroethylene	0.054	_____	5.6	_____
Trichloromonofluoromethane	0.02	_____	33	_____
Xylenes (total)	0.32	_____	28	X _____

California List Prohibited WastesLevel (mg/l)Treatment Standard

Halogenated Organic Compounds	1000.0	Incineration*	* These treatment standards
Nickel (Ni)	134.0	None	do not preclude solvent
Thallium (Tl)	130.0	None	recovery or use as fuel
Chlorinated Biphenyls (PCB's)	50.0	Incineration	prior to land disposal.

Waste Descriptions and/or Treatment SubcategoryTreatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)Check All That Apply

Waste code	Description	Wastewaters	Nonwastewaters	
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA	
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RCRGS, FSUBS, OR INCIN	X
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT	
D004	Arsenic (As)	268.43(a)	268.41(a)	
D005	Barium (Ba)	268.43(a)	268.41(a)	
D006	Cadmium (Cd)	268.43(a)	268.41(a)	
D007	Chromium (Cr)	268.43(a)	268.41(a)	
D008	Lead (Pb)	268.43(a)	268.41(a)	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a)	
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC	
D010	Selenium (Se)	268.43(a)	268.41(a)	
D011	Silver (Ag)	268.43(a)	268.41(a)	
F005	2-Ethoxyethanol	268.42(a) INCIN*	268.42(a) INCIN*	
F005	2-Nitropropane	268.42(a) INCIN*	268.42(a) INCIN*	
Other Codes See attachment for supplemental list				

This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45 for the above contaminants that are subject to treatment. (check if applicable) _____

Generator Name: WHEELING PITTSBURGH STEEL

EPA ID: QHD010448231

Generator Signature: _____

Name & Title: _____

Safety-Kleen Sample Number: 352486

Control Number: 0228693-5

NOTE: The USEPA has not determined treatment standards for the new TCLP EPA Waste Numbers: D018 through D043.

163-R4505
S WASHFR SERVICE
LING PITTSBURGH STEEL

PREQUALIFICATION EVALUATION
MANIFEST INFORMATION

REVISED:
RUN: 09/21/94
CONTROL #: 228693-5
SAMPLE #: 352486

RED MANIFEST FORM: GN

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

FORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO. OHD010448231	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>
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GENERATOR NAME AND MAILING ADDRESS WHEELING PITTSBURGH STEEL 001 MAIN ST MARTINS FERRY OH 43935 GENERATOR PHONE 304 234 7243	A. STATE MANIFEST DOCUMENT NO B. STATE GENERATOR ID
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TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TRANS ID D. TRANSPORTER PHONE 3042336567
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TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TRANS ID F. TRANSPORTER PHONE
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FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD KY 40068	10. US EPA ID NUMBER KYD053348108	G. FACILITY STATE ID H. FACILITY PHONE 502 845 2453
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US DOT DESCRIPTION RQ WASTE PAINT RELATED MATERIAL 3 UN1263 PG III (F003)(ERG#26)	CONTAINER	I. WASTE NO F003 D001
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ADDITIONAL DESCRIPTION FOR THE MATERIALS LISTED ABOVE	K. HANDLING CODES
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5. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

EMERGENCY RESP# 708-888-4660

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP. EPA ID NO: KYD053348108
3700 LAGRANGE ROAD SMITHFIELD, KY 40068

Under manifest number _____ line number _____ (enter 11a, 11b, 11c, OR 11d) the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA WASTE CODES: **F003 D001**

<u>F001-F005 Spent Solvents</u>		<u>TREATMENT STANDARDS (total mg/l. except as noted by TCLP)</u>			
<u>Regulated Hazardous Constituent</u>	<u>Wastewater W/Solvents</u>	<u>Check All That apply</u>	<u>All Other Solvent Wastes</u>	<u>Check All That Apply</u>	
Acetone	0.28		160		
Benzene	0.07		3.7		
N-Butyl alcohol	5.6		2.6		
Carbon disulfide	0.014		4.8	TCLP	
Carbon tetrachloride	0.057		5.6		
Chlorobenzene	0.057		5.7		
Cresol (m- and p-isomers)	0.77		3.2		
o-Cresol	0.11		5.6		
Cyclohexanone	0.36		0.75	TCLP	
o-Dichlorobenzene	0.088		6.2		
Ethyl acetate	0.34		33		
Ethyl benzene	0.057		6.0	X	
Ethyl ether	0.12		160		
Isobutyl alcohol	5.6		170		
Methanol	5.6		0.75	TCLP	
Methylene chloride	0.089		33		
Methylene chloride(from Pharm. Industry)	0.44		33		
Methyl ethyl ketone	0.28		36		
Methyl isobutyl ketone	0.14		33		
Nitrobenzene	0.068		14		
Pyridine	0.014		16		
Tetrachloroethylene	0.056		5.6		
Toluene	0.08		28		
1,1,1-Trichloroethane	0.054		5.6		
1,1,2-Trichloroethane	0.03		7.6		
1,1,2-Trichloro-1,2,2-trifluoroethane	0.057		28		
Trichloroethylene	0.054		5.6		
Trichloromonofluoromethane	0.02		33		
Xylenes (total)	0.32		28	X	

<u>California List Prohibited Wastes</u>	<u>Level (mc/l)</u>	<u>Treatment Standard</u>	
Halogenated Organic Compounds	1000.0	Incineration*	
Nickel (Ni)	134.0	None	
Thallium (Tl)	130.0	None	
Chlorinated Biphenyls (PCB's)	50.0	Incineration	

* These treatment standards do not preclude solvent recovery or use as fuel prior to land disposal.

<u>Waste Descriptions and/or Treatment Subcategory</u>		<u>Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)</u>		<u>Check All That Apply</u>
<u>Waste code</u>	<u>Description</u>	<u>Wastewaters</u>	<u>Nonwastewaters</u>	
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA	
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, OR INCIN	X
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT	
D004	Arsenic(As)	268.43(a)	268.41(a)	
D005	Barium (Ba)	268.43(a)	268.41(a)	
D006	Cadmium (Cd)	268.43(a)	268.41(a)	
D007	Chromium (Cr)	268.43(a)	268.41(a)	
D008	Lead (Pb)	268.43(a)	268.41(a)	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a)	
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC	
D010	Selenium (Se)	268.43(a)	268.41(a)	
D011	Silver (Ag)	268.43(a)	268.41(a)	
F005	2-Ethoxyethanol	268.42(a) INCIN*	268.42(a) INCIN*	
F005	2-Nitropropane	268.42(a) INCIN*	268.42(a) INCIN*	
Other Codes See attachment for supplemental list				

This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45 for the above contaminants that are subject to treatment. (check if applicable) _____

Generator Name: WHEELING PITTSBURGH STEEL EPA ID: OH0010448231

Generator Signature: _____ Name & Title: _____

Safety-Kleen Sample Number: 352486 Control Number: 0228693-5

SCREENING SAMPLES

CHESTER LabNet - Pittsburgh
3000 Tech Center Drive
Monroeville, PA 15146-9998
(412) 825-9833

Laboratory Analyses Report
For: Wheeling-Pittsburgh Steel
Martins Ferry, OH.

Date of Report: 06/09/95

ANALYSES

Source: S1
Log Number: 95-0008508
Date Collected: 05/22/95
Time Collected: 11:00
Date Received: 05/25/95

Account No.: 296
Project No.: 9505373
Client No.: 040030
P.O. No.: 040030

	Conc.	Unit	Detection Limit	Procedure	Anal	Test Date
LEACHPREP						
TCLP VOLATILES						
TCLP Extraction, Volatiles	done	None	N/A	1311	jej	05/31
TCLP NONVOL						
TCLP Extraction, Nonvolatiles	done	None	N/A	1311	jej	05/31
WET CHEM						
WET CHEMISTRY						
Chloride, Cl	<10	mg/kg	10.0	9252	mls	06/07
pH	7.07	Units	N/A	9045	jaf	05/30
Sulfate, SO4	270	mg/kg	10.0	9038	jaf	06/07
Phosphorus Total, P	100	mg/kg	0.1	365.2	mls	06/06

CHESTER LabNet - Pittsburgh
3000 Tech Center Drive
Monroeville, PA 15146-9998
(412) 825-9833

Laboratory Analyses Report
For: Wheeling-Pittsburgh Steel
Martins Ferry, OH.

Date of Report: 06/09/95

ANALYSES

Source: Tc1p Volatile Extraction of 950008508
Log Number: 95-0008509
Date Collected: 05/22/95
Time Collected: 11:00
Date Received: 05/25/95

Account No.: 296
Project No.: 9505373
Client No.: 040030
P.O. No.: 040030

	Conc.	Unit	Detection Limit	Procedure	Anl	Test Date
LEACHPREP						
TCLP VOLATILES						
Extraction Fluid, Volatiles	#1	None	N/A	1311	jej	05/31
Extract pH, Volatiles	6.10	Units	N/A	9040	jej	05/31
Initial Filtrate, Volatiles	0	ml	N/A	1311	jej	05/31
Weight Extracted, Volatiles	25	Grams	N/A	1311	jej	05/31
GC/MS						
VOLATILE SURRO						
1,2-Dichloroethane-d4 (Surrogate)	92	%Recovery	N/A	8260	abt	06/01
Bromofluorobenzene (Surrogate)	100	%Recovery	N/A	8260	abt	06/01
Toluene-d8 (Surrogate)	104	%Recovery	N/A	8260	abt	06/01
TCLP VOLATILES						
1,1-Dichloroethene (TCLP)	<5	ug/L	5.0	8260	abt	06/01
1,2-Dichloroethane (TCLP)	<5	ug/L	5.0	8260	abt	06/01
Benzene (TCLP)	<5	ug/L	5.0	8260	abt	06/01
Carbon Tetrachloride (TCLP)	<5	ug/L	5.0	8260	abt	06/01
Chloroform (TCLP)	<5	ug/L	5.0	8260	abt	06/01
Chlorobenzene (TCLP)	<5	ug/L	5.0	8260	abt	06/01
Methyl Ethyl Ketone (TCLP)	<10	ug/L	10.0	8260	abt	06/01
Tetrachloroethylene (TCLP)	<5	ug/L	5.0	8260	abt	06/01
Trichloroethylene (TCLP)	<5	ug/L	5.0	8260	abt	06/01
Vinyl Chloride (TCLP)	<5	ug/L	5.0	8260	abt	06/01

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Monroeville, PA 15146-9998
(412) 825-9833

Laboratory Analyses Report
For: Wheeling-Pittsburgh Steel
Martins Ferry, OH.

Date of Report: 06/09/95

ANALYSES

Source: Tc1p Nonvolatile Extraction of 95-0008508
Log Number: 95-0008510
Date Collected: 05/22/95
Time Collected: 11:00
Date Received: 05/25/95

Account No.: 296
Project No.: 9505373
Client No.: 040030
P.O. No.: 040030

	Conc.	Unit	Detection Limit	Procedure	Anl	Test Date
LEACHPREP						
TCLP NONVOL						
Extraction Fluid, Nonvolatiles	#1	None	N/A	1311	jej	05/31
Extract pH, Nonvolatiles	6.10	Units	N/A	9040	jej	05/31
Initial Filtrate, Nonvolatiles	0	ml	N/A	1311	jej	05/31
Weight Extracted, Nonvolatiles	100	Grams	N/A	1311	jej	05/31
MET/ICP						
TCLP METALS						
TCLP Silver, Ag	<.01	mg/L	0.01	6010	rtg	06/07
TCLP Arsenic, As	<.03	mg/L	0.03	6010	rtg	06/07
TCLP Barium, Ba	0.94	mg/L	0.01	6010	rtg	06/07
TCLP Cadmium, Cd	0.028	mg/L	0.005	6010	rtg	06/07
TCLP Chromium, Cr	<.01	mg/L	0.01	6010	rtg	06/07
TCLP Lead, Pb	0.21	mg/L	0.02	6010	rtg	06/07
TCLP Selenium, Se	<.04	mg/L	0.04	6010	rtg	06/07
MET/MISC						
TCLP METALS						
TCLP Mercury, Hg	<.0002	mg/L	0.0002	7470	jap	06/05

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3000 Tech Center Drive
Monroeville, PA 15146-9998
(412) 825-9833

Laboratory Analyses Report
For: Wheeling-Pittsburgh Steel
Martins Ferry, OH.

Date of Report: 06/09/95

ANALYSES

Source: S2
Log Number: 95-0008511
Date Collected: 05/22/95
Time Collected: 11:30
Date Received: 05/25/95

Account No.: 296
Project No.: 9505373
Client No.: 040030
P.O. No.: 040030

	Conc.	Unit	Detection Limit	Procedure	Anl	Test Date
LEACHPREP						
TCLP VOLATILES						
TCLP Extraction, Volatiles	done	None	N/A	1311	jej	05/31
TCLP NONVOL						
TCLP Extraction, Nonvolatiles	done	None	N/A	1311	jej	05/31
WET CHEM						
WET CHEMISTRY						
Chloride, Cl	<10	mg/kg	10.0	9252	mls	06/07
pH	7.27	Units	N/A	9045	jaf	05/30
Sulfate, SO4	51	mg/kg	10.0	9038	jaf	06/07
Phosphorus Total, P	2800	mg/kg	0.1	365.2	mls	06/06

CHESTER LabNet - Pittsburgh
3000 Tech Center Drive
Monroeville, PA 15146-9998
(412) 825-9833

Laboratory Analyses Report
For: Wheeling-Pittsburgh Steel
Martins Ferry, OH.

Date of Report: 06/09/95

ANALYSES

Source: Tc1p Volatile Extraction of 950008511
Log Number: 95-0008512
Date Collected: 05/22/95
Time Collected: 11:30
Date Received: 05/25/95

Account No.: 296
Project No.: 9505373
Client No.: 040030
P.O. No.: 040030

	Conc.	Unit	Detection Limit	Procedure	Test Anl Date
LEACHPREP					
TCLP VOLATILES					
Extraction Fluid, Volatiles	#1	None	N/A	1311	jej 05/31
Extract pH, Volatiles	5.83	Units	N/A	9040	jej 05/31
Initial Filtrate, Volatiles	0	ml	N/A	1311	jej 05/31
Weight Extracted, Volatiles	25	Grams	N/A	1311	jej 05/31
GC/MS					
VOLATILE SURRO					
1,2-Dichloroethane-d4 (Surrogate)	92	%Recovery	N/A	8260	abt 06/01
Bromofluorobenzene (Surrogate)	101	%Recovery	N/A	8260	abt 06/01
Toluene-d8 (Surrogate)	104	%Recovery	N/A	8260	abt 06/01
TCLP VOLATILES					
1,1-Dichloroethene (TCLP)	<5	ug/L	5.0	8260	abt 06/01
1,2-Dichloroethane (TCLP)	<5	ug/L	5.0	8260	abt 06/01
Benzene (TCLP)	<5	ug/L	5.0	8260	abt 06/01
Carbon Tetrachloride (TCLP)	<5	ug/L	5.0	8260	abt 06/01
Chloroform (TCLP)	<5	ug/L	5.0	8260	abt 06/01
Chlorobenzene (TCLP)	<5	ug/L	5.0	8260	abt 06/01
Methyl Ethyl Ketone (TCLP)	<10	ug/L	10.0	8260	abt 06/01
Tetrachloroethylene (TCLP)	<5	ug/L	5.0	8260	abt 06/01
Trichloroethylene (TCLP)	<5	ug/L	5.0	8260	abt 06/01
Vinyl Chloride (TCLP)	<5	ug/L	5.0	8260	abt 06/01

CHESTER LabNet - Pittsburgh
3000 Tech Center Drive
Monroeville, PA 15146-9998
(412) 825-9833

Laboratory Analyses Report
For: Wheeling-Pittsburgh Steel
Martins Ferry, OH.

Date of Report: 06/09/95

ANALYSES

Source: Tc1p Nonvolatile Extraction of 95-0008511
Log Number: 95-0008513
Date Collected: 05/22/95
Time Collected: 11:30
Date Received: 05/25/95

Account No.: 296
Project No.: 9505373
Client No.: 040030
P.O. No.: 040030

	Conc.	Unit	Detection Limit	Procedure	Anal	Test Date
LEACHPREP						
TCLP NONVOL						
Extraction Fluid, Nonvolatiles	#1	None	N/A	1311	jej	05/31
Extract pH, Nonvolatiles	5.83	Units	N/A	9040	jej	05/31
Initial Filtrate, Nonvolatiles	0	ml	N/A	1311	jej	05/31
Weight Extracted, Nonvolatiles	100	Grams	N/A	1311	jej	05/31
MET/ICP						
TCLP METALS						
TCLP Silver, Ag	<.01	mg/L	0.01	6010	rtg	06/07
TCLP Arsenic, As	<.03	mg/L	0.03	6010	rtg	06/07
TCLP Barium, Ba	0.58	mg/L	0.01	6010	rtg	06/07
TCLP Cadmium, Cd	0.036	mg/L	0.005	6010	rtg	06/07
TCLP Chromium, Cr	<.01	mg/L	0.01	6010	rtg	06/07
TCLP Lead, Pb	0.051	mg/L	0.02	6010	rtg	06/07
TCLP Selenium, Se	<.04	mg/L	0.04	6010	rtg	06/07
MET/MISC						
TCLP METALS						
TCLP Mercury, Hg	<.0002	mg/L	0.0002	7470	jap	06/05

CHAIN OF CUSTODY RECORD

[illegible]